

EXHIBIT “6”

Samuels, Michael

From: Samuels, Michael
Sent: Friday, November 4, 2022 5:19 PM
To: Glen Lenihan
Cc: Jeffrey Buss; Flores, Daniel F.
Subject: Bank of America, N.A. v. City View Blinds of N.Y. Inc., et al.; 20-cv-9911-SLC
Attachments: Letter to Signature Bank-information subpoena (with enclosures)(27359284....pdf

Importance: High

Tracking:	Recipient	Delivery
	Glen Lenihan	
	Jeffrey Buss	
	Flores, Daniel F.	Delivered: 11/4/2022 5:19 PM
	BANK OF AMERICA _ SMALL BUSINESS _ NY _ City View of Blinds of NY Inc_ _12048_00360_ _All Correspondence	

Glen,

Pursuant to the enclosed Information Subpoena with Restraining Notice served on Signature Bank on or about July 26, 2022, Signature Bank restrained, among other things, the following joint accounts of Moshe Gold and Raizy Gold ending in: (i) '8641 (the "**8641 Account**"), (ii) '8032 (the "**8032 Account**") and (iii) '2979 (the "**2979 Account**," together with the 8032 Account, the "**Other Joint Accounts**").

Since the joint accounts were restrained on or about August 1, 2022, both you and defendants' prior counsel (Jeff Buss, copied here) have asserted generally that some portion of the joint accounts were the property of Moshe Gold's wife, Raizy Gold. With respect to such claims, we note that the vast majority of the funds restrained (\$1,003,494.40 deposited into the 8641 Account on 7/28/22) were the proceeds of a life insurance policy (the "**Life Policy**") payable upon the passing of Moshe' Gold's mother, Helena Gold, which were paid to Moshe Gold, as Beneficiary of the Life Policy. No documentation has been provided to support Raizy Gold's alleged interest in the Life Policy proceeds.

Please be advised that we intend to move for the turnover of: (i) the full amount of the Life Policy proceeds paid to Mr. Gold and deposited into the 8461 Account, together with ½ of the remaining balance of the 8641 Account (\$12.73) and (ii) ½ of the restrained funds in the Other Joint Accounts (\$95.94, representing ½ of \$191.88).

In the event that you have any documentation to support Raizy Gold's interest in the Life Policy proceeds deposited into the 8641 Account (or any of the other funds in the joint accounts), we hereby request that you provide such documentation for our review by no later than close of business on **Tuesday, November 8, 2022 at 5:00 p.m.** Specifically, we request that a copy of the Helena Gold Life Policy be provided, along with any other documents that demonstrate that Raizy Gold was a beneficiary of the Life Policy.

In the event that documentation sufficient to establish Raizy Gold's interest in the joint accounts (and in particular her interest in the Life Policy proceeds) is not provided by the aforementioned deadline, please be advised that the Bank intends to file its Turnover Motion promptly thereafter.

We look forward to hearing from you.

Regards,

Michael

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